

May 4, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

0467 '99 JUN -4 A10:14

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods. The FDA's labelling requirement should not be permitted to expire. I agree with the FDA conclusion in its initial petition that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains, and the labeling should remain. Storage qualities and spoilage characteristics of irradiated whole foods are different than non-irradiated whole foods, and the consumer needs to have this information to make an informed selection of whole foods.

The word "pasteurization" should not be used in any phrase designed to substitute for the words "radiation" or "irradiation." The process of pasteurization is done to liquid foods, and is widely understood by the public. We don't talk about pasteurizing flours or oils to delay spoilage of these products. I believe that it would be misleading to the public to imply that meats, fruits and vegetables are "pasteurized." The necessary information for the consumer is the fact that they have been irradiated.

My suggestion to improve the current labeling would be to include the date of irradiation on the package, along with temperature and humidity guidelines for storage and a "use by" date. The public has little appreciation that psychrophilic bacteria such as *Listeria* and *Yersinia* will grow at refrigerated temperatures, posing a greater health risk as time goes by. Pasteurized milk is not usually a problem in this regard, as it tends to (obviously) spoil before the few remaining organisms are able to proliferate. Packaged meats and processed cheeses, however, may not be visibly "spoiled" despite long tenures in the refrigerator. Irradiation, like pasteurization, doesn't kill 100% of organisms, and I believe that a "use by" date is our best way to prevent illnesses from psychrophilic bacteria.

Thank you for the opportunity to comment.

Sincerely,



Lisa Haglund MD FACP

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